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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 * * *

17 **Courtney Cloud,**

18 Case No.: 2:23-cv-00468-JCM-DJA

19 Plaintiff,

20 vs.

21 **Allstate Indemnity Company;** Does 1
22 through 10, inclusive, and Roe
23 Corporations 1 through 10, inclusive,

24 Defendants.

25 **Stipulation and [Proposed] Order to
26 Extend Deadlines
27 (5th Request)**

28 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties hereto,
by and through their respective counsel of record, that the discovery deadlines in
this case be extended as follows:

29 **A. COMPLETED DISCOVERY**

30 1. Plaintiff has served her initial disclosures of witnesses and documents, and
31 supplements thereto;
32 2. Defendant has served its initial disclosures of witnesses and documents, and
33 supplements thereto;
34 3. Plaintiff has propounded and answered written discovery requests;



1 4. Defendant has propounded and answered written discovery requests;

2 5. Plaintiff and Defendant have disclosed their initial and rebuttal expert

3 witnesses and supplements thereto;

4 6. Plaintiff has taken the depositions of Allstate employees Sean Owens,

5 Christine Fox, Jonathan Bourne, Rodney Farney and Steven Peterson;

6 7. Defendant has taken the deposition of Plaintiff;

7 8. Defendant has taken the deposition of Plaintiff's experts Paul Thomas and

8 Stephen Strzelec.

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10 **B. OUTSTANDING DISCOVERY**

11 1. Deposition of the Allstate Indemnity Company's FRCP 30(b)(6) witness;

12 2. Deposition of Defendant's expert witness Steven Plitt.

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14 **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

15 Counsel for the parties have been diligent in conducting discovery but need

16 additional time to conduct the remaining two depositions. The deposition of Allstate

17 Indemnity Company's FRCP 30(b)(6) witness was noticed for August 1, 2024, but

18 there was a scheduling conflict, and it was rescheduled for September 26, 2024, close

19 to the close of discovery. The parties also agreed to reschedule the deposition of

20 Defendant's expert Steven Plitt, due to scheduling conflicts earlier this month. The

21 next available date for Defendant's expert is October 29, 2024, which is after the

22 close of discovery. Therefore, there is good cause to extend the discovery deadlines

23 as requested.

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25 **D. PROPOSED EXTENDED DEADLINES**

26 The parties have agreed to extend the discovery deadlines in this case, as follows:

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	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	Closed	Closed
Rebuttal expert disclosures	Closed	Closed
Close of Discovery	October 7, 2024	November 6, 2024
Dispositive motions	November 5, 2024	December 6, 2024
Pretrial Order	December 6, 2024	January 6, 2025 or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

11 Dated this 29th day of August, 2024.

12 H&P LAW

13 /s/ *Marjorie Hauf*

14 _____
15 Marjorie Hauf, Esq.
16 Nevada Bar No. 8111
17 Cara Xidis, Esq.
18 Nevada Bar No. 11743
19 Attorneys for Plaintiff

Dated this 29th day of August, 2024.

KEATING LAW GROUP

/s/ *John T. Keating*

John T. Keating, Esq.
Nevada Bar No. 6373
Attorney for Defendant

IT IS SO ORDERED.

18 ORDER



19 DANIEL J. ALBREGTS
20 UNITED STATES MAGISTRATE JUDGE
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22 DATED: 8/30/2024

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